

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
FRANK E. MAHONEY	:	
	:	
Debtor	:	Case No. 16-14519(MDC)
	:	
	:	Hearing Date: November 17, 2016
	:	Time: 11:00 a.m.
	:	Courtroom #2
	:	900 Market Street
	:	Philadelphia, PA 19107

**DEBTORS' RESPONSE IN OPPOSITION TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362(d)**

The Debtor, Frank E. Mahoney¹, hereinafter referred to as the “Debtor,” by and through their counsel, Center City Law Offices, LLC, hereby respectfully files their response in opposition to the Motion of Pingora Loan Servicing, LLC., (the “Lender”) for Relief from the Automatic Stay. For the reasons more fully set forth below, the Debtor submits that there is no basis for relief from the stay

1. Neither admitted nor denied. Debtor has insufficient knowledge or belief as to whether the movant is the current owner of the mortgaged premises.
2. Admitted in part. Debtor is the owner with his wife, Lyell P. Mahoney (“Lyell” or “Mrs. Mahoney”). Mrs. Mahoney is not a co-debtor in this bankruptcy.
3. Neither admitted nor denied. Debtor has insufficient knowledge or belief as to whether the movant is the current owner of the mortgaged premises.
4. – 12. Denied as conclusions of law, therefore no response is required.

¹ Movant incorrectly filed its motion against an imaginary Co-Debtor, Lyell P. Mahoney, the Debtor’s wife. Mrs. Mahoney did not file a joint case with her husband.

WHEREFORE, the Debtor, Frank Mahoney respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Lender.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

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Dated: November 13, 2016